

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of Pacific Gas and Electric Company for
Adoption of Electric Revenue Requirements and Rates
Associated with its 2017 Energy Resource Recovery
Account (ERRA) and Generation Non-Bypassable
Charges Forecast and Greenhouse Gas Forecast Revenue
and Reconciliation (U 39 E)

Application 16-06-003
(Filed June 1, 2016)

**MOTION OF THE ALLIANCE FOR RETAIL ENERGY MARKETS AND DIRECT
ACCESS CUSTOMER COALITION TO ACCEPT LATE FILED RESPONSE**

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July 7, 2015

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Pursuant to Rule 11.1 of the Commission’s Rules of Practice and Procedure, the Alliance for Retail Energy Markets (“AReM”)¹ and the Direct Access Customer Coalition (“DACC”)² hereby submit this motion requesting the Commission to accept a late-filed response to the subject application in Docket A.16-06-003, the Application of Pacific Gas & Electric Company (“PG&E”) filed on June 1, 2016, in the above-captioned docket (“Application”) and noticed in the Commission’s Daily Calendar on June 6, 2016. The one-day late filing of a response to the Application that is being served today on all parties is due to an error by counsel in calendaring the appropriate due date. It is believed that no party should be harmed by the late filing.

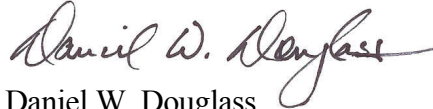
Rule 11.1 of the Commission Rules of Practice and Procedures allows the Commission or the Administrative Law Judge to consider a motion to take specific action related to an open proceeding before the Commission. Pursuant to this rule, AReM and DACC request that the

¹ AReM is a California non-profit mutual benefit corporation formed by electric service providers that are active in the California’s direct access (“DA”) market. This filing represents the position of AReM, but not necessarily that of a particular member or any affiliates of its members with respect to the issues addressed herein.

² DACC is a regulatory advocacy group comprised of educational, governmental, commercial and industrial customers that utilize direct access for all or a portion of their electrical energy requirements. In the aggregate, DACC member companies represent over 1,900 MW of demand that is met by both direct access and bundled utility service and about 11,500 GWH of statewide annual usage.

Commission accept their response to the Application as being late-filed. For the above reasons, AReM and DACC respectfully request that the Commission grant this motion and accept their joint response as being filed late.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Daniel W. Douglass". The signature is fluid and cursive, with the first name "Daniel" and last name "Douglass" being clearly legible.

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